

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAROL A. KEATING-REICHWEIN,
Plaintiff

v.

UNIVERSAL COMPANIES,
Defendant.

CIVIL ACTION COMPLAINT

No: 13-cv-07290

(Judge Restrepo)

PLAINTIFF'S PRETRIAL MEMORANDUM

1. Nature of Action and Jurisdiction. This is a contract action.

The parties are citizens of different states and the matter in controversy exceeds \$75,000.

2. Summary of Facts. It is undisputed that the Plaintiff, Carol Keating-Reichwein, d.b.a. C.A. Keating Consulting, and the Defendant, Universal Companies, were parties to an Agreement effective February 1, 2010-January 31, 2011.

The "Compensation and Expenses" section, on page 2 of the Agreement, provided that, in addition to a quarterly retainer of \$5,000:

"For services rendered, the Universal Companies agrees to pay C.A. Keating Consulting a success fee equivalent to five percent of the **full amount of funding awarded** to the Universal Companies as a **result** of the **submission** of the **proposal prepared** by Carol A. Keating." (emphasis added).

Prior to February 1, 2010, the Plaintiff had been paid two success fees by Universal Companies under predecessor agreements with a similar success fee provision.

As a result of the submission of proposals prepared by the Plaintiff, Universal Companies was awarded funding from a 21st Century Community Learning Center Grant (Cohort 5), Renaissance School Initiative for Universal Bluford Charter School, Renaissance School Initiative for Universal Daroff Charter School, a School Improvement Grant for Universal Bluford Charter School, a School Improvement Grant for Universal Daroff Charter School and a Promise Neighborhood Planning Grant. While Universal Companies agreed to pay, and did pay, Plaintiff Keating a 5% success for the \$780,000 21st Century Community Learning Center Grant (Cohort 5), amounting to \$39,000, Universal Companies has refused to pay Plaintiff 5% success fees for the 5 other awards resulting from the successful proposals prepared by Ms. Keating-Reichwein.

Plaintiff will defer to Defendant's Pretrial Memorandum for it to explain why it has not paid these success fees for the more than \$64,000,000 in awards which it received as a result of proposals prepared by Carol Keating-Reichwein.

3. Monetary Damages, exclusive of prejudgment interest:

a. School Improvement Grant for

<u>Universal Daroff Charter:</u> 5% of \$1,980,000;	\$99,000.00
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b. School Improvement Grant For

<u>Universal Bluford Charter:</u> 5% of \$1,980,000;	\$99,000.00
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c. Promise Neighborhood Planning

<u>Grant:</u> 5% of \$500,000;	\$25,000.00
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d. Renaissance School Initiative for

Universal Bluford Charter School: 5% of sum of varying annual amounts¹; \$1,400,893.99

e. Renaissance School Initiative for

Universal Daroff Charter School: 5% of sum of varying annual amounts.¹ \$1,608,819.28
\$3,232,713.27

4. Witnesses.

a. Shahied Dawan:² CFO of Universal Companies. FRE 611(c) witness. Liability and damages. Will testify concerning the structure of Universal Companies, the funds awarded to Universal Companies as a result of the proposals prepared by Carol Keating, the amounts incurred or allocated by Universal Companies for consultants, management fees and administrative costs, document/email explanation and his interactions with the Plaintiff, including her preparations of the successful proposals.

b. Abdur Rahim Islam, Sr.:¹ CEO of Universal Companies. FRE 611(c) witness. Liability and Damages. Will testify concerning the structure of Universal Companies, the funds awarded Universal Companies as a result of the proposals prepared by Carol Keating, document/email explanation and his interactions with the Plaintiff, including her preparations of the successful proposals.

¹See Special Comments, ¶7 of this Pretrial Memorandum for discussion explaining the calculation of the Renaissance awards.

²Universal Companies had agreed to produce these witnesses without need for a subpoena.

c. Raheem Islam, Jr.:² V.P. of Financial Development and Governmental Affairs for Universal Companies. FRE 611(c) witness. Liability. Will testify concerning his professional interaction with the Plaintiff, the high quality of Plaintiff's work, document/email explanation and the grant writing expertise and skills which the Plaintiff demonstrated in the successful proposals which she prepared.

d. Carol Keating-Reichwein: Liability and damages. The Plaintiff will testify concerning her relationship with Universal Companies since 2006, her receipt of success fees from Universal prior to the February 1, 2010-January 31, 2011 contract, the preparation of the successful proposals and her failed efforts to be paid the success fees for the awards in question.

5. A schedule of all exhibits is attached hereto. Apparently in merging the parties' exhibit lists into 1 joint list, resulting in over 300 exhibits, a few exhibits may have been inadvertently dropped or mislabeled. Counsel should have these errors corrected within a few days.

6. Plaintiff's counsel estimates the number of days required for trial at 5.

7. Special comments: Under the Renaissance School Initiative, the Philadelphia School District awarded Universal Companies funds for five years to operate the Bluford Universal Charter School and the Daroff Universal Charter School. The amounts paid were based on a formula with annual variable factors of student enrollment and the particular year's state determined per pupil subsidy. Four of the five school years are already

completed, and the sums awarded for those 4 years have been paid to Bluford Universal Charter School and Daroff Universal Charter School. Through mid-September, three equal monthly payments to Bluford and three different equal monthly payments to Daroff have been made so far this 2014-2015 year. Plaintiff has multiplied these equal monthly payments by 12 to arrive at the amount awarded for the 2014-2015 school year. The mathematical calculation of the full amount of funding from the Renaissance Initiative is attached as Exhibit A hereto.

8. Stipulations. The parties have not yet reached any stipulations.

9. Objections to Exhibits. As of 2:30 p.m., October 16, 2014, when this memo was finalized, Plaintiff's counsel has not completed his review of the voluminous exhibits identified by the Defendant. However, so far he has detected no objections as to authenticity and would have no objection other than relevancy to the others.

10. Deposition Testimony. None other than possible use for impeachment purposes.

Respectfully submitted,

STROKOFF & COWDEN, P.C.

By: 

Elliot A. Strokoff
I.D. No. 16677
132 State Street
Harrisburg, PA 17101
(717) 233-5353

DATE:

10/16/14

RENAISSANCE INITIATIVE PAYMENTS

DAROFF

2010-2011	\$6,188,030.68
2011-2012	6,042,017.91
2012-2013	5,897,986.65
2013-2014	7,154,461.68
2014-2015: by 9/14- (3) equal monthly payments of \$574,490.72 were made. Therefore annual payments are projected to be.	<u>6,893,888.64</u>

\$32,176,385.56

TOTAL DAROFF

BLUFORD

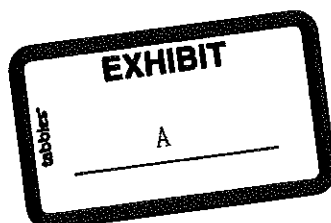
2010-2011	5,629,645.75
2011-2012	5,557,010.04
2012-2013	5,455,118.19
2013-2014	5,754,755.94
2014-2015: by 9/14- (3) equal monthly payments of \$468,445.83 were made. Therefore annual payments are projected to be.	<u>5,621,349.96</u>

\$28,017,879.88

TOTAL BLUFORD

TOTAL RENAISSANCE FUNDING AWARDED

\$60,194,265.44



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Joint Trial Exhibit List

Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
1.		12/11/13	Complaint					
2.	3252-3278		Carol A. Keating-Reichwein Curriculum Vitae and Accolades					
3.	D010376 - D010386		Carol A. Keating Consulting Curriculum Vitae					
4.		3/10/14	Answer and Affirmative Defenses of Defendant Universal Companies to Plaintiff's Complaint					
5.		8/1/14	Plaintiff Carol A. Keating-Reichwein's Answers to Defendant Universal Companies to Plaintiff's Complaint					
6.		8/6/14	Defendant's Response to Plaintiff's First Set of Interrogatories					
7.		8/5/14	Deposition Transcript of Carol A. Keating-Reichwein (w/ exhibits)					
8.	1275	8/13/10	Dawan to Keating honoring success fee for 21 st and contract					
			Keating/Dawan re: Invoices for May & Aug.					

EXHIBIT LIST

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
9.	1433-36	8/15/10	2010, with "changes to the contract"					
10.	1422-25	8/15/10	Keating to Dawan "contract attached" accepting changes					
11.	7-9	8/13/10	2010 Letter Agreement (signed)					
12.	3698-3708	2009	Universal Education Companies 2009 Form 990					
13.	3709-42	2010	Universal Education Companies 2010 Form 990					
14.	3743-72	2011	Universal Education Companies 2011 Form 990					
15.	3502-29	2009	Universal Community Homes 2009 Form 990					
16.	3470-3501	2010	Universal Community Homes 2010 Form 990					
17.	3437-69	2011	Universal Community Homes 2011 Form 990					
18.	3530-64	2010	Universal Bluford 2010 Form 990					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
19.	3565-97	2011	Universal Bluford 2011 Form 990					
20.	3598-3628	2010	Universal Daroff 2010 Form 990					
21.	3629-62	2011	Universal Daroff 2011 Form 990					
22.	D3333-64	2009	UICS 2009 Form 990					
23.	3365-3403	2010	UICS 2010 Form 990					
24.	3404-3436	2011	UICS 2011 Form 990					
25.	2624	1/25/10	Keating to Islam Jr. email 21 st CCLC evaluation					
26.	2625	1/25/10	Keating to Islam Jr. email 21 st CCLC Rules					
27.	2626-2633	1/25/10	Keating to Islam Jr. email Final activities form for 21 st CCLC					
28.	2635-37	1/27/10	Keating to Islam Jr. email "Called and no Answer"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
29.	2640	1/28/10	Keating to Islam Jr. email Need for specific data from each participating school					
30.	2641-2682	1/28/10	Keating to Islam Jr. email "We need responses to these questions for 21 st CCLC"					
31.	2683	1/28/10	Keating to Islam Jr. email "Question about current 21 st CCLC program"					
32.	2684	1/28/10	Keating to Islam Jr. email "Responses Thur., Jan. 28 th -7:15 p.m."					
33.	2685	1/28/10	Keating to Islam Jr. email "Numbers needed for budget"					
34.	2688	1/29/10	Keating to Islam Jr. email "Sample Response"					
35.	2689-2720	2/1/10	Islam Jr. to Keating email "FWD 21 st Century Questions to Rahim Jan. 29"					
36.	2724	2/4/10	Keating to Islam Jr. Email "Help please"					
37.	2726-27	2/4/10	Keating to Islam Jr. email "Signed Prog. Assurance Form Needs to be Mailed: (resend of doc. e.g., _____)"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
38.	2728	2/4/10	Keating to Islam Jr. email "re: Responses/input needed for 21 st CCLC grant narrative"					
39.	2732	2/5/10	Keating to Islam Jr. email "Insert into Universal's letter"					
40.	2733-34	2/5/10	Keating to Islam Jr. email w/attach. "School District Letter of Agreement"					
41.	2735-37	2/5/10	Keating to Islam Jr. email "Title Page" w/attach.					
42.	2742-2786	2/6/10	Keating to Islam Jr. email "Responses to Needs Asso.-Questions 1, 2, 3"					
43.	2787-90	2/6/10	Keating to Islam Jr. email "Question 3"					
44.	2792-93	2/6/10	Keating to Islam Jr. email "Question 4 Response/Needs Assessment"					
45.	2796	2/6/10	Keating to Islam Jr. email "fwd: More edits-response to Question #5-needs assessment"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
46.	2799	2/6/10	Keating to Islam Jr. "Question #6 Response-Needs Assessment"					
47.	2800-02	2/6/10	Keating to Islam Jr. "Question #8 Response-Needs Assessment"					
48.	2805-06	2/6/10	Keating to Islam Jr. "Question #9 Response-Needs Assessment"					
49.	2807	2/6/10	Keating to Islam Jr. "Question #10-Response-Needs Assessment"					
50.	2808-09	2/7/10	Keating to Islam Jr. "Sustainability-Question #1"					
51.	2810-11	2/7/10	Keating to Islam Jr. email "Sustainability-Question #6"					
52.	2814	2/8/10	Keating to Islam Jr. email Re: "No Subject"					
53.	2821-23	2/8/10	Islam Jr. to Keating email "Document 1" w/attach					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
54.	2839	2/11/10	Keating to Islam 21sr CCLC Final in Word					
55.			21 st CCLC (Cohart 5) Application					
56.	1145-1188	8/12/10	Dawan to Keating "School Improvement Grants" w/attach.					
57.	1190-1244	8/12/10	Dawan to Keating "Fwd: SIG Follow Up Documentation Request" w/Rubic attach.					
58.	1275	8/13/10	Dawan to Keating email "Re: School Improvement Grants" (re: also getting can't act)					
59.	1277	8/13/10	Dawan to Keating "School Action Plans" (w/o attachment)					
60.	1363-66	8/13/10	Keating/Dawan email "Our Guide and Start Up Responses" w/attach.					
61.	1368-1371	8/13/10	Islam Jr.to Keating "Info for Daroff" and "Bluford Info"					
62.	1373-84	8/13/10	Keating to Dawan email "Draft #1-Friday Nite" w/attach.					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
63.	1245-1250	8/13/10	Dawan to Keating email "FW: Fwd: SIG Follow Up Documentation Request"					
64.	D007451	8/13/10	Keating to Dawan, Islam Sr., Islam Jr., Lewis email "Re: School Improvement Grants"					
65.	D012985	8/13/10	Dawan to Islam Sr. email "FW: School Improvement Grants" w/ attach.					
66.	D011292 - D011300	8/13/10	Keating to Dawan, Islam Sr., Islam Jr. email "Draft #1-Friday Nite" w/ attach.					
67.	1277-1366	8/13/10	Keating to Dawan, Islam Sr., Islam Jr. email "School Action Plans" w/ attach.					
68.	1367	8/13/10	Dawan to Keating email "Re: Our Guide and Start UP Responses"					
69.	1373	8/13/10	Dawan to Islam Jr., Islam Sr. email "Draft #1-Friday Nite"					
70.	1368-1369	8/13/10	Islam Jr. to Keating email "FW: Info for Daroff"					
71.	1370-	8/13/10	Islam Jr. to Keating email "FW: Bluford Info"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
	1371							
72.	1372	8/14/10	Keating/Dawan emails "Re" FW" FWD" SIG Follow Up Documentation Request"					
73.	1385-96	8/14/10	Keating to Dawan "Bluford School Improvement Plan-Final (Sat)" w/attach.					
74.	1397-1421	8/15/10	Keating to Dawan "SIP Grants for Bluford and Daroff" w/attach.					
75.	D007426 - D007450	8/15/10	Keating to Dawan, Islam Sr., Islam Jr., Lewis email "SIP grants for Bluford and Daroff" w/attach.					
76.	D002281 - D002284	8/15/10	Keating to Dawan, Islam Sr., Islam Jr. email "Contract Attached" w/ attach.					
77.	1433-1436	8/15/10	Dawan to Keating email "RE: Invoices for May and August 2010" w/ attach.					
78.	1426-1427	8/17/10	Islam Jr. to Keating email "RE: Contract Attached"					
79.	1428	8/28/10	Keating/Dawan "Re: Corrected Quarterly Grant amount for Universal"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
80.	1429-1430	8/30/10	Keating /Islam Jr. email "Re: Corrected Quarterly Grant amt. for Universal ("normal rate should apply")					
81.	1432	9/2/10	Keating/Islam Jr. email "Re: SIG for Bluford and Daroff"					
82.	D011449 - D011450	9/3/10	Feiner to Dawan email "SSIG Application"					
83.	D007423 - D007425	9/17/10	Keating to Islam Jr., Islam Sr., Lewis email "PRESS RELEASES" w/ attach.					
84.	D011454	6/10/11	Letter from the PA Department of Education to Shahied Dawan re: Universal Daroff CS 2009-2010 School Improvement Grant—SIG (1003g) – Project # 139-10-1086 Amount: \$561,740.00 Approved					
85.	D011455	6/10/11	Letter from the PA Department of Education to Shahied Dawan re: Universal Bluford CS 2009-2010 School Improvement Grant—SIG (1003g) – Project # 139-10-1087 Amount: \$809,194.00 Approved					
86.	1251-1274		SIG LEA Application for Restart Model Rubric					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
87.	D000001 - D000034		SIG LEA Application-Bluford					
88.	D00393- D00428		SIG LEA Application-Daroff					
89.	D011302 - D011348	6/16/10	Charter for Universal Bluford Charter School Contract No. 65/F11 School Reform Commission Resolution No. SRC-49					
90.	D011349 - D011412	6/16/10	Charter for Universal Daroff Charter School Contract No. 69/F11 School Reform Commission Resolution No. SRC-50					
91.	2858	10/1/10	Invoice SIG Bluford					
92.	1454	April 2010	Letter from Promise Neighborhoods Grant					
93.	D012307	5/3/10	Walker to Islam Jr. email 'FW: Education Secretary Arne Duncan Releases Application for Promise Neighborhoods'					
94.	D012308	5/3/10	Saaba to Islam Jr. email 'FW: Education Secretary Arne Duncan Releases Application for Promise Neighborhoods'					
95.	D012930	5/3/10	Email Notification to Islam Jr. "Reminder: Federal Student Aid Webcast is today!"					
96.	D012447	5/7/10	Lewis to team email "Promise Neighborhood"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
97.	D013209 - D013212	5/8/10	Dr. Leroy D. Nunery II to Lewis, Islam Sr., email "Fwd: [CHARTERSCHOOLSPROGRAM] Promise Neighborhoods Planning Grants"					
98.	D012305 - D012306	5/11/10	Jenkins to Walker, Islam Jr., Lewis, Douthit, Dawan email "FW: Education Secretary Arne Duncan Releases Application for Promise Neighborhoods"					
99.	1438	5/12/10	Keating to Islam Jr., Islam Sr. email "Promise Neighborhoods"					
100.	1452	5/12/10	Islam Jr. to Islam Sr. email "Driving Question for PROMISE NEIGHBORHOOD PROPOSAL"					
101.	D006167	5/13/10	Keating to Islam Jr., Islam Sr. email "Promise Neighborhood-Outline" w/attach.					
102.	1462	5/13/10	Keating to Islam Jr., Islam Sr. email "(no subject)" (re: recent activity on P.N.)					
103.	1463	5/13/10	Keating to Islam Jr., Islam Sr. email "Universal-Point Breeze Promise Neighborhood Zone"					
104.	D006063	5/13/10	Keating to Islam Jr., Islam Sr. email "Promise Neigh.-REQUIRED FORMS"					
105.	1458-		Keating to Islam Jr., Islam Sr. email "Promise					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
	1461	5/13/10	Neighborhood-OUTLINE" w/ attach.					
106.	D012590		Brown to Islam Jr., Dino Rossi email "RE: Promise Neighborhood power point presentation"					
	- D012593	5/14/10						
107.	D012446	5/15/10	Islam Sr. to lnunery2@comcast.net, Lewis email "Promise Neighborhood"					
108.	1475-1478	5/16/10	Womack to Keating email "Fw: Promise Neighborhoods in Phila. STEM education, etc..."					
109.	D006278		Keating to Islam Jr., Islam Sr., Womack email "Re: Promise Neighborhood"					
	- D006279	5/17/10						
110.	1492-95	5/18/10	Keating to Islam Jr., Islam Sr. email "Draft-something on paper to jump start concept paper: w/attach.					
111.	1496-1504	5/18/10	Keating to Islam Jr., Islam Sr. email "Diagram to initiate presentation-Draft #1" w/attach.					
112.	D013215		Nunery to Packman, et al email "Re: Department of Education Grants -Promise Neighborhoods Application" w/ attach.					
	- D013220	5/19/10						

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
113.	D012952 - D012953	5/20/10	PNINTENT to Islam Jr. email "Thank you for submitting your Intent to Apply to the Promise Neighborhoods"					
114.	D012483 - D012500	5/20/10	McGee to Nunery, et al. email "Re: Department of Education Grants -Promise Neighborhoods application" w/ attach.					
115.	D012292 - D012298	5/20/10	Islam Sr. to Keating, Islam Jr. email "FW: Department of Education Grants -Promise Neighborhoods application" w/ attach.					
116.	1532-36	5/24/10	Islam Jr. to Keating email "Grant Strategy" w/attach.					
117.	1537-43	5/24/10	Keating to Islam Sr. email response "Re: Grant Strategy" w/attach.					
118.	1544	5/24/10	Islam Sr. to Keating email "RE: Grant Strategy"					
119.	1545-49	5/24/10	Keating to Islam Sr. email response "Re: Grant Strategy" w/attach. (additional edits)					
120.	1554-1560	5/24/10	Islam Sr. to Keating email "Re: Grant Strategy" w/ attach.					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
121.	D005291	5/27/10	Islam Sr. to Islam Jr., Keating, Dawan, Walker, Butler email "HUD & USDOE"					
122.	1565	5/27/10	Keating to Islam Sr., Islam Jr., Dawan, Walker, Butler email "Re: HUD & USDOE"					
123.	1573-77	6/1/10	Keating to Islam Jr., Islam Sr. email "Section 4-Susatin and Scale Up-6/1/10" w/attach.					
124.	D005278	6/1/10	Islam Sr. to team email "Conference Call"					
125.	1585	6/2/10	Keating to Islam Jr., Islam Sr. email "Re: FW: Promise Neighborhood" (Universal Definitely meets criteria)					
126.	D006159	6/2/10	Keating to Islam Jr., Islam Sr. email "Some District Questions"					
127.	D006035-36	6/2/10	Keating to Islam Jr., Islam Sr. email "PN-Recommended Results and Indicators"					
128.	D010396	6/2/10	Keating to Islam Jr., Islam Sr. email "Resumes of Key Personnel (Carol directing Jr.)"					
129.	1590	6/2/10	Keating to Islam Jr., Islam Sr. email "Bio for mini grant or Response to Inquiry or Bid"					
		6/2/10	Rossi to Islam Jr. email "RE: Promise					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
130.	D006038		Neighborhood, Change in meeting time"					
131.	1587	6/2/10	Keating to team email "Some District Questions"					
132.	1591	6/3/10	Keating to Islam Jr., Islam Sr. email "Promise Neighborhood Timeline"					
133.	D012422 D012425	6/4/10	Packman to Islam Jr., et al email "Neighborhood of Promise Proposal"					
134.	1598-1601	6/6/10	Keating to Islam Sr. email "Sample Responses for 1-3"					
135.	D006015-26	6/6/10	Keating to Islam Jr., Islam Sr. email "Keating edits-Sunday Nite-6-6-10" w/attach.					
136.	1633	6/6/10	Keating/Islam Sr. email "Re: Keating edits-Sunday Nite-6-6-10					
137.	1640-43	6/7/10	Keating to Islam Sr. email "Attached doc with tracking of edits to letter" w/attach.					
138.	D006238-44	6/7/10	Keating to Islam Jr., Islam Sr. email "Requirements for Contents of the PN-MOU" w/attach.					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
139.	D006449	6/7/10	Keating to Islam Sr., Islam Jr. email "Re: Follow-up on Promise Neighborhood"					
140.	D05719- D05720	6/7/10	Nunery to Islam Sr., Keating, Lewis, Islam Jr., et al email "Re: Follow-up on Promise Neighborhood"					
141.	D012436	6/7/10	Islam Sr. to Edwards, Lewis, Islam Jr. email "Promise Neighborhood Initiative"					
142.	D010257	6/7/10	Keating to Islam Sr. email "Re: Keating Edits-Sunday nite-6-6-10"					
143.	1640- 1643	6/7/10	Keating to Islam Sr. email Edits to Promise Neighborhoods Initiative Letter					
144.	D00414- D005426	6/7/10	Islam Sr. to team email "Follow-up on Promise Neighborhood" w/ attach.					
145.	1746	6/8/10	Keating to Islam Jr. email "Re: Appendix for PN"					
146.	D000204	6/8/10	Letter from Maria Pajil Battle to Secretary Arne Duncan					
147.	1694- 1697	6/8/20	Weiss to team email "RE: Requirements for the contents of PN-MOU"					
148.	1753	6/9/10	Brown to Keating email "RE: Already Existing Programs and Services"					

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149.	1738-40	6/9/10	Keating to Islam Jr. email "(no subject)" w/attach.					
150.	1748-49	6/9/10	Keating to Islam Jr. email "Transmittal letter for ltr. of support" w/attach.					
151.	D012427	6/10/10	Islam Sr. to team email "Planning Meeting"					
152.	D005220 - D005224	6/10/10	Promise Neighborhood Initiative Grant Application Update					
153.	1795-1803	6/12/10	Keating to Islam Sr. email "Re: Planning Document" w/attach. (start of question 1)					
154.	1804-12	6/12/10	Keating to Islam Jr., Islam Sr. email "Added Phys. Activity-Indicator of Need" w/attach.					
155.	D006612-15	6/12/10	Keating to Islam Jr., Islam Sr. email "Table of Contents" or Guide for Development" w/attach.					
156.	1791-93	6/12/10	Islam Sr. to Keating email "Promise Neighborhood Planning Document" w/attach.					
157.	D006201	6/12/10	Keating to Islam Sr., Islam Jr. email "Re: Promise Neighborhood Planning Document"					-
158.	1779-1782	6/12/10	Keating to Islam Sr., Islam Jr. email "Table of Contents or Guide for Development" w/ attach.					

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159.	D005110 - D005115	6/12/10	Islam Sr. to team email "FW: Planning Document"					
160.	D005271	6/12/10	Islam Sr. to team email "Planning Document"					
161.	1813-20	6/13/10	Keating to Islam Jr., Islam Sr. email "Added to Section II" w/attach.					
162.	1822-32	6/13/10	Keating to Islam Jr., Islam Sr. email "Please review this one-Most Recent Send @ 1:04" w/attach.					
163.	1853-71	6/13/10	Keating to Islam Jr., Islam Sr. email "Latest Version-Sunday afternoon" w/attach.					
164.	D006043	6/13/10	Keating to Islam Jr., Islam Sr. email "Language re: an partners cooperating with the National Evaluator"					
165.	D006160 -62	6/14/10	Keating to Islam Jr., Islam Sr. email "Re: Executive Summary to PN" w/attach.					
166.	D010157 - D010158	6/14/10	Keating to team email Conference Call and Start of Continuum					
167.	D012438	6/15/10	Islam Sr. to team email "Promise Neighborhood Initiative"					

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168.	D012435	6/15/10	Islam Sr. to team email "Promise Neighborhood Initiative"					
169.	D005100 - D005102	6/15/10	Islam Sr. to Lewis, Islam Jr., Keating email "(no subject) (abbreviated Exec. Summary [vision statement]) w/ attach."					
170.	D004765 - D004799	6/15/10	Islam Sr. to team email "Promise Neighborhood Documents for Review" w/ attach.					
171.	D005637 - D004779	6/15/10	Islam Sr. to Sonkowsky, Unterberger email "Promise Neighborhood Planning documents"					
172.	1918-1919	6/15/10	Islam Sr. to Lamar, Keating email "FW: Target areas"					
173.	1942	6/16/10	Keating to Islam Sr. email "Re: Promise Neighborhoods"					
174.	2005	6/16/10	Keating to Islam Sr. email "Re: FW: Promise Neighborhood Planning Document"					
175.	2007	6/16/10	Keating to Islam Jr., Islam Sr. email "Re" FW" Target Area" (map of targeted area)					
			Islam Sr. to Keating and others email "Promise					

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176.	D005277	6/16/10	Neighborhood Conference Call					
177.	D006044	6/16/10	Keating to Lamar, Islam Sr., Gross email "Re: Promise Neighborhood Initiation"					
178.	D008356-58	6/16/10	Islam Sr. to Keating email "FW: Indicators and Result"					
179.	D005279 D005280	6/16/10	Islam Sr. to team email Info and Promise Neighborhood Planning Documents					
180.	D005242 D005243	6/16/10	Underwood to Islam Jr., Islam Sr. and Keating email					
181.	D006269	6/16/10	Keating to Islam Sr. email Promise Neighborhood Planning Documents					
182.	D012444 D012445	6/16/10	Islam Sr. to team email Determining Requests from City and School District					
183.	D012430	6/16/10	Islam Sr. to team email Requesting Info and Confirmation of Attendance in planning meeting					
184.	1978-1979	6/16/10	Islam Sr. to team email Indicators Identified by USDOE that must be addressed					
185.	D012776		Woodall to Islam Sr. email Support Letter for					

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	D012780	6/17/10	Promised Neighborhoods					
186.	D012437	6/17/10	Islam Sr. to DA Seth Williams email requesting support and assistance re: Universal Companies for Promise Neighborhoods					
187.	D012439	6/17/10	Islam Sr. to Carolyn Adams email Temple University's support of Universal Companies for Promise Neighborhoods					
188.	D012431	6/17/10	Lewis to team email Planning Meeting Agenda					
189.	D012280	6/17/10	Islam Sr. to Brown-Sow, Islam Jr. email Draft of Concept Paper					
190.	D005874	6/18/10	Keating to team email Narrative updated during Promise Neighborhood Conference Call					
191.	2065-71	6/19/10	Islam Sr. to Keating email "District Mon" w/attach.					
192.	2124-2131	6/20/10	Keating to Islam Sr. email "Re: District Mon" w/attach.					
193.	D006280-87	6/20/11	Keating to Islam Sr. email "Final Edits to PSD Memorandum" w/attach					
	2072-2112		Keating to Islam Sr. email "Keating-Need for Project- 6-19-10" w/attach.					

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194.		6/20/10						
195.	2113-2114	6/20/10	Keating to Islam Sr. email "Sample language for Mon-Theory of Action" and "Theory of Change"					
196.	2133-2134	6/20/10	Keating to Islam Jr., Islam Sr. email "Alcorn Stats"					
197.	2187-92	6/20/10	Keating to Islam Jr., Islam Sr. email "Section 1a- 6-20-10 @11:52 p.m." w/attach.					
198.	D006013	6/20/10	Keating to Islam Sr., Islam Jr. email Direction for Quesiton 1.a					
199.	2153-2154	6/20/10	Islam Sr. to Sonkowsky, Keating email "RE: Targeted Schools"					
200.	2181	6/20/10	Islam Sr. to Islam Jr. email "Please check this out-thanks"					
201.	D006447	6/21/10	Keating to Islam Sr. email "Section V.D.- response"					
202.	2221-2226	6/21/10	Keating to Islam Sr. email requesting acknowledgement of receipt of Section 1.a w/ attach.					

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203.	2217-2218	6/21/10	Weiss to Keating, Islam Sr., Lewis email "Prom Neighborhood Info"					
204.	2251	6/21/10	Weiss to Keating, Islam sr., Lewis email "Prom Neighborhood Info"					
205.	2229-2250	6/21/10	Califano to Islam Sr., Lewis, Keating, et al email "RE: Draft MOU" w/ attach.					
206.	D006272-75	6/22/10	Keating to Islam Sr. email "Section 5 Management Plan-6-22-10" w/ attach.					
207.	2358-2361	6/22/10	Keating to Islam Sr. email Section 3 A and B w/ attach.					
208.	2362-2363	6/22/10	Keating to Islam Sr. email Section 5.D for Review w/ attach.					
209.	2361-2367	6/22/10	Keating to Islam Sr. email Section 5 for Review w/ attach.					
210.	2368-2380	6/22/10	Keating to Islam Sr., Islam Jr., Lewis email Section 6 for Review w/ attach.					
211.	D012428	6/22/10	Islam Sr. to Kathy Con Allen email Draft Support Letter for modification w/ attach.					
212.	2271-		Califano to team email "Re: Promise					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
	2273	6/22/10	Neighborhood Initiative"					
213.	2282-2287	6/22/10	Lamar to team email "Re: Promise Neighborhood Initiative"					
214.	2348	6/22/10	Islam Sr. to Islam Jr., Lewis email "KEATING-6-22-10-9:49 PM"					
215.	D006046-62	6/23/10	Keating to Islam Sr. email "Sections 2, 3, and 5" w/attach.					
216.	D006189-94	6/23/14	Keating to Islam Sr. email "Section 5" w/attach.					
217.	D006205-16	6/23/10	Keating to Islam Sr. email "Section 6" w/attach.					
218.	D006450-59	6/23/10	Keating to Islam Sr., Lewis email "Section 4-Carol's Writes" w/attach.					
219.	2381-2391	6/23/10	Keating to Islam Sr. email Section 2 (and Raheem Add On) w/ attach.					
220.	D013206 D013208	6/23/10	Islam Jr. to Islam Sr. Email Request for Support from Senator Williams					
221.	D012283	6/24/10	Islam Sr. to team email Latest Sections to be Proofed and Reviewed					
			Keating to Islam Jr., Islam Sr. email "Uploading					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
222.	D006041	6/25/10	letters of support and MOUs to e-grants. . .”					
223.	2483	6/25/10	Keating to Islam Jr. email “Needs”					
224.	2484	6/25/10	Keating to Islam Jr. email “Within 3 working days”					
225.	D000039 -000392	6/25/10	Promise Neighborhood Grant Application					
226.	D006465	6/25/10	Keating to Islam Sr. acknowledging work on Promise Neighborhood and thanking him for opportunity					
227.	2485	6/25/10	Keating to Islam Sr. email “Re: (no subject)”					
228.	D012432 - D012433	6/26/10	Islam Sr. to team email acknowledging successful electronic submission of Promise Neighborhood Grant application and personal gratitude for all contributions					
229.	D013266	7/6/10	Letter from Keating to Dr. Janice Butler re: grant submitted on behalf of Universal Companies under Readiness and Emergency Management for School Grant					
	D11452-							

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
230.	53	9/21/10	Grant Award Notification – Promise Neighborhood					
231.	2859-60	10/1/10	Promise Neighborhood-Professional Services Agreement					
232.	3690	12/5/10	Email Lamar to Keating re: Promise Neighborhood					
233.	D000035 - D000392		Universal Companies Application for Promise Neighborhood Grant					
234.	D011495 - D012112	9/9/11	PointGrays Promise Neighborhood Strategic Plan of Action for the Point Breeze and Grays Ferry Neighborhoods Philadelphia, PA sponsored by Universal Companies in coordination with The City of Philadelphia and The School District of Philadelphia					
235.	3689	12/5/10	Email Keating to Islam, Jr. fwd. Lamar's email					
236.	3691	12/10/10	Islam Jr. to Keating email "working on your					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	Π Evidence	Δ Evidence	Ruling	Witness
			invoices"					
237.	3692-93	12/13/10	Keating to Islam Jr. email re: Universal payment dispute and chart					
238.	3696-97	12/16/10	Keating to Islam Jr. email re: Key Points for Discussion					
239.	D007825	2/1/11	Islam Jr. to Keating email "approached Shahied . . ."					
240.	3329-3332	4/13/11	Ltr. from Cass re: Monies Due C.A. Keating Consulting					
241.	3178	9/23/10	Faatimah email re: Promise Neighborhood					
242.	3179-80	10/20/10	Faatimah email: "Let's stand for Progress"					
243.	2863	1/27/11	Keating/Faatimah re: Keating Contract with Universal					
244.	2864	1/27/11	Keating/Faatimah; Keating contract with Universal, "Do you have a copy of the signed K"					
245.	2865	1/27/11	Keating/Faatimah; "Contract Attached"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
246.	2867	2/2/11	Keating/Faatimah re: C.A. Keating Consulting; Will get back to you next week					
247.	2868	2/3/11	Keating/Dawan emails re: Professional Service Agreement (Promise Neighborhood)					
248.	2869	2/10/11	Keating/Faatimah email re: "Moving Forward"					
249.	D009245	2/12/11	Keating to Islam Sr. re: I did try to call					
250.	3663	2/10/11	Keating/Islam Sr. email "Your facts are all wrong so call me"					
251.	D05929-005930	12/1-10 12/6/10	Emails Keating/Islam Sr. /Islam Jr. /Lamar "Promise Neighborhood Invoice"					
252.	D02247	2/3/11	Keating to Islam Jr., Islam Sr. "Re: Professional Services Consulting Agreement"					
253.	602-647	11/12/09	Keating to Islam Jr. email "Start up-very rough draft" w/attach					
254.	651	11/12/09	Keating to Islam Jr., Islam Sr., Lewis email "City of Philadelphia Business Privilege License"					
255.	658	11/12/09	Keating to Islam Jr. email "Need for Resources and Administrative Communications"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
256.	660	11/12/09	Keating to Islam Jr., Islam Sr., Lewis email "Need for Financial Statements from Shahied"					
257.	661	11/12/09	Keating to Islam Jr., Islam Sr., Lewis email "Docs needed from Shahied"					
258.	666-669	11/13/09	Islam Jr. and others ("No subject")					
259.	670	11/13/09	Keating to Islam Jr. email "Reference Info"					
260.	732-777	11/14/09	Keating to Islam Jr. and others "Phila-SD Proposal-Draft #1 entitled Abstract" w/attach.					
261.	778	11/16/09	Keating to Islam Jr., Islam Sr., Lewis email "Please review and approve on Letterhead"					
262.	786	11/16/09	Keating to Islam Jr. and others "Management Needed"					
263.	787	11/16/09	Keating to Islam Jr. and others "History of Universal's Work for the District"					
264.	789	11/16/09	Keating to Islam Jr., Islam Sr., Lewis email "Need for Resumes"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
265.	790	11/16/09	Keating to Islam Jr. email "Appendix E"					
266.	797-842	11/16/09	Keating to Islam Jr. email "Draft #2" w/attach.					
267.	843	11/16/09	Keating to Lewis email "Re: Please review and approve on letterhead"					
268.	31-35	1/27/10	The School District of Philadelphia Request for Qualifications No. 43—Lead Applications Titled: Renaissance Schools Initiative—Year 1					
269.	D007596-97	1/30/10	Keating to Islam Jr., Islam Sr. email "Jump Start for Response 1.a"					
270.	D00773-74	1/30/10	Keating to Islam Jr. email "Responses for 1.-a-b-c-"					
271.	D007598-07600	1/30/10	Keating to Islam Sr. email "FWD: Responses for 1.a-b-c- (Renaissance Grant)" w/attach.					
272.	50-69	1/31/10	Keating to team email "Office of Planning, Research and Development-RFQ 43 Start Up-Draft #1" w/ attach.					
273.	71	2/1/10	Islam Jr. to team email "Renaissance Schools"					
274.	72	2/1/10	Keating to Lewis email "Re: Please review and approve on letterhead"					

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275.	D011441	2/3/10	Renaissance Planning Group Minutes					
276.	99-100	2/9/10	Renaissance Planning Group Minutes					
277.	73-76	2/9/10	Islam Jr. to Keating email: "FW: Meeting Notes" w/ attach					
278.	89-97	2/9/10	Islam Sr. to Keating email "FW: Renaissance Schools" w/attach.					
279.	113-126	2/9/10	Islam Sr. to Keating email "FW: Renaissance Schools" w/attach.					
280.	101-112	2/9/10	Keating to team email "Renaissance Section 1" w/ attach.					
281.	127-130	2/10/10	Islam Jr. to Keating email "FW: RFQ Section 2" w/ attach.					
282.	132-134	2/10/10	Islam Sr. to team email "RE: Response to RFQ" w/ attach.					
283.	135	2/10/10	Keating to Islam Sr. email "Re: Response to RFQ"					
284.	172-185	2/11/10	Keating to team email: "RE: Keating Edits 2-10-10 (Lauryn's Development)" w/ attach.					
285.	186	2/11/10	Keating to team "Re: Keating Edits 2-10-10					

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			(Lauryn's Development)"					
286.	D007522-25	2/12/10	Keating to Islam Jr. email "Section 4(a) re-writes for your review" w/attach.					
287.	215-238	2/12/10	Keating to Islam Jr., & Lewis email "Keating edits-Fri @ 2:43 PM" w/attach.					
288.	239-62	2/12/10	Keating to team email "Carol's edits-Fri @ 4:36" w/attach.					
289.	D007629-52	2/12/10	Keating to team email "Final for review over the weekend and discussion on Monday at noon" w/attach					
290.	263-082	2/12/10	Keating to Islam Jr. email "Keating's edits-latest version-10:25 Fri." w/attach.					
291.	D002401	2/12/10	Keating to Islam Sr. email "RE: Final for review . . ." (apologizing for delay)					
292.	284-302	2/12/10	Keating to others email "Latest edits-2/11/10@ 11:54 PM" w/attach.					
293.	387	2/12/10	Rahim Sr. to Keating email "RE: FINAL for review over the weekend and discussion on Monday at noon"					
294.	388	2/12/10	Lewis to team email "Deadline"					
295.	389-401	2/15/10	Womack to team email "No subject"					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
296.	402	2/15/10	Douthit to Keating, Islam Sr., Womack email "Data Charts"					
297.	D009432	2/16/10	Keating to Islam Sr. email "Section 2(b) material"					
298.	D009501-02	2/16/10	Keating/Islam Sr. emails "Re: Please disregard the last email and attachment I just sent"					
299.	D009435	2/16/10	Keating to Islam Sr., Lewis, Womack email "RFQ243-Section 2 abcdef-Complete Keating"					
300.	412-416	2/16/10	Keating to team email "Section 2" w/ attach					
301.	D09423-25	2/17/10	Keating to Islam Sr. email "Section 4b talks about underperforming and over age students"					
302.	D009431	2/17/10	Keating to Islam Sr. email "RFQ243-Section 1abc Raheem to Carol and Chad-Keating changes for review"					
303.	D007510-21	2/17/10	Keating to Islam Sr. email "Keating changes to yours attached" w/attach.					
304.	D002394-99	2/18/10	Keating to Islam Jr., Islam Sr. email "Section 3 - BIOS" w/ attach.					
305.	430-435	3/2/10	Islam Sr. to Keating, Islam Jr., Lewis email "RFI-section 1ab" w/attach.					

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Tab	Bates-Stamp	Dates	Description of Item	Used in Dep	□ Evidence	Δ Evidence	Ruling	Witness
306.	D001437	3/5/10	RFQ-43 Renaissance School Initiative-Year 1: Qualification Lead Applicants					
307.	D011437 - D011440	3/5/10	Letter from the School District of Pennsylvania to Rahim Islam, Sr. advising that Universal Companies has qualified under Request for Qualifications (RFQ-43) to participant in the Request for Proposal (RFP-260) phase of the Renaissance Schools Initiative – Year 1					
308.	861-888	3/8/10	Islam Sr. to team email Application for The School District of Philadelphia Request for Proposals – Lead Applicants No. 260 Title: Renaissance Schools Initiative—Year 1 Issued March 8, 2010 and request for team meeting w/ attach.					
309.	D09503-07	3/16/10	Keating to Islam Jr., Islam Sr. email “Section 7-Keating 1 st Draft”					
310.	D007702-08	3/17/10	Keating to Islam Jr., Islam Sr. email “Section 4(a) and (b)					
311.	935-936	3/17/10	Islam Jr. to team email Highlights from 3/16/10 Q&A at 440 Broad 3/16/10 w/ attach.					

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312.	937-46	3/19/10	Islam Sr. to Keating email "Section 1" w/attach.					
313.	D007785-7795	3/22/10	Keating to Islam Jr., Islam Sr. email "Keating's Final edits to Raheem's Section 1" w/attach.					
314.	D007602-7610	3/22/10	Keating to Islam Jr., Islam Sr. email "Keating-Section 4(a)and (b) final 3-22-10" w/attach.					
315.	948-956	3/22/10	Islam Sr. to Keating, Islam Jr. email "Re: Status of Proposal"					
316.	D009412	3/23/10	Keating to Islam Jr., Islam Sr. email "Section 4-Keatings Edits-3/23/10					
317.	957-961	3/23/10	Islam Sr. to Keating email "Section 5" w/attach					
318.	962-967	3/23/10	Islam Sr. to Islam Jr., Keating email "Re: Section 5" w/ attach.					
319.	D009408	3/23/10	Keating to Islam Sr. email "Re: Section 5"					
320.	D009535-43	3/24/10	Keating to Islam Jr., Islam Sr. email "Keating edits to Section 5-Clean and Tracking" w/attach.					
321.	970-977	3/24/10	Islam Jr. to Keating, Islam Jr. email Revised Section 7 w/ attach.					
322.	D009322	3/25/10	Keating to Islam Jr., Islam Sr. email "Re:					

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	-29		Section 7" w/attach.					
323.	978-1044	3/26/10	Islam Sr. to team email RFP-260 (without Sections 9 and 10) to be Proofread for grammar in order to be delivered next afternoon w/ attach.					
324.	1045-1120	3/26/10	Islam Sr. to team email inquiring about review completions of RFP-260 (without Sections 9 and 10)					
325.	D007709-68	3/29/10	Keating to Islam Sr. email "Fwd: All Sections Final Edits/Reviews" w/9 attach.					
326.	D007525 - D007594	3/29/10	Keating to Islam Sr. Final Edits/Reviews to all sections w/ attach.					
327.	1121	3/30/10	Islam Sr. to team email informing of oral interview presentation to School District scheduled for April 7 th and requesting availability and confirmation for presentation and pre-presentation preparation					
328.	1122	3/31/10	Islam Sr. to team email Info for Conference Call Scheduled for 4/2/10					
329.	1123	4/2/10	Islam Sr. to team email Preparations for Pre-Oral Presentation Meeting					
			Carly Bolger (School District of Philadelphia) forwarded to Lewis, FWD to team email					

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330.	D008388	4/6/10	Common Questions likely to be asked during Universal's Proposal Oral Presentation					
331.	D00429-866	3/26/10	Universal Bluford RFP #260					
332.	D00967-1433	3/26/10	Universal Daroff RFP #260					
333.	D011479-86	7/10-9/14	Universal Charter @ Bluford Summary Report					
334.	D011487-93	7/10-9/14	Universal Charter @ Daroff Summary Report					